TAXATION ON HOLDERS OF SECURITIES

The income tax and capital gains tax liabilities of holders of the H Shares are subject to the laws and practices of the PRC and of the jurisdictions in which such holders of the H Shares are resident or otherwise subject to tax. The following summary of certain relevant taxation provisions is based on current laws and practices, does not take into account any expected change or amendment to the relevant laws or policies and does not constitute any opinion or advice. This discussion does not deal with all possible tax consequences relating to an investment in the H Shares, nor does it consider specific circumstances of any particular investor, as some of such circumstances may be subject to special rules. Accordingly, you should consult your own tax advisor regarding the tax consequences of investing in the H Shares. This discussion is based on laws and relevant interpretations in effect as of the Latest Practicable Date, and such laws and relevant interpretations may change and may have retrospective effect.

This discussion does not address any domestic taxation aspects of the PRC other than income tax, capital gains tax and profits tax, sales tax/VAT, stamp duty and estate duty. Prospective investors are urged to consult their financial advisors regarding the tax consequences of owning and disposing of the H Shares in the PRC and other regions.

INLAND TAXATION OF THE PRC

Dividend Tax

Individual Investors

According to the Individual Income Tax Law of the PRC (《中華人民共和國個人所得稅法》) (the "**Individual Income Tax Law**"), which was last amended by the SCNPC on August 31, 2018 and became effective on January 1, 2019, and the Implementation Regulations of the Individual Income Tax Law of the PRC (《中華人民共和國個人所得稅法實施條例》), which was most recently amended by the State Council on December 18, 2018 and became effective on January 1, 2019, dividends distributed by PRC enterprises to individual investors are subject to individual income tax levied at the flat rate of 20%. According to the Notice on Relevant Issues Regarding Differentiated Individual Income Tax Policies for Listed Companies' Dividends and Bonuses (《關於上市公司股息紅利差別化個人所得稅政策有關問題的通知》), which was promulgated by the MOF, the State Taxation Administration of the PRC (中華人民共和國國家稅務總局) (the "**STA**") and the CSRC on September 7, 2015 and came into effect on September 8, 2015, shares of listed companies acquired by an individual through public offering and transfer in the market with a holding period of more than one year are temporarily exempted from individual income tax; with a holding period of not more than one month, the entire amount of dividends will be subject to individual income tax; with a holding period of more than one month but not more than one year, 50% of the amount of dividends will be subject to individual income tax; and individual income tax will be levied at a uniform tax rate of 20% on the income mentioned above.

According to the Arrangement between Chinese Mainland and the Hong Kong Special Administrative Region for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income (《內地和香港特別行政區關於對所得避免雙重徵稅和防止偷漏稅的安排》) (the "**Arrangement for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income**") signed between Chinese Mainland and Hong Kong on August 21, 2006, the PRC government may levy tax on dividends paid by a PRC company to a Hong Kong resident (including natural person and legal entity), but the amount of tax shall not exceed 10% of the total amount of dividends payable. If a Hong

Kong resident directly holds 25% or more of the equity interest in a PRC company and the Hong Kong resident is the beneficial owner of the dividends and meets other conditions, such tax shall not exceed 5% of the total amount of dividends payable by the PRC company. The Fifth Protocol to the Arrangement between Chinese Mainland and the Hong Kong Special Administrative Region for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income (《內地和香港特別行政區關於對所得避免雙重徵稅和防止偷漏稅的安排第五議定書》) (the "**Fifth Protocol**"), which was issued by the STA and became effective on December 6, 2019, provides that such provisions shall not apply to arrangements or transactions made for one of the primary purposes of obtaining such tax benefits.

Enterprise Investors

According to the Enterprise Income Tax Law of the PRC (《中華人民共和國企業所得稅法》, the "**Enterprise Income Tax Law**"), which was last amended by the SCNPC on December 29, 2018 and became effective on the same date, and the Implementation Regulations of the Enterprise Income Tax Law of the PRC (《中華人民共和國企業所得稅法實施條例》, the "**Implementation Regulations**"), which was last amended by the State Council on December 6, 2024 and became effective on January 20, 2025, if a non-resident enterprise does not have an establishment or premise in the PRC or has an establishment or premise in the PRC but its PRC-sourced income has no real connection with such establishment or premise, it is generally subject to a rate of 10% on PRC-sourced income (including dividends distributed in respect of shares of a PRC resident enterprise issued and listed in Hong Kong). The aforesaid income tax payable by the non-resident enterprises shall be deducted and withheld at source, and the payer of the income shall have the obligation to withhold the income tax from the amount payable to the non-resident enterprise. Such withholding tax may be reduced or exempted in accordance with an applicable treaty for the avoidance of double taxation.

According to the Circular on Issues Relating to the Withholding and Remitting of Enterprise Income Tax by PRC Resident Enterprises on Dividends Distributed to Overseas Non-Resident Enterprise Shareholders of H Shares (《關於中國居民企業向境外H股非居民企業股東派發股息代扣代繳企業所得稅有關問題的通知》), which was issued by the STA on November 6, 2008 and became effective on the same date, a PRC-resident enterprise must withhold enterprise income tax at a uniform rate of 10% on the dividends paid to non-PRC resident enterprise holders of overseas listed H Shares when distributing dividends for the years of 2008 and beyond. The above tax rate may be further modified in accordance with tax treaties or agreements (if applicable) entered into between the PRC and the relevant countries or regions.

According to the Arrangement for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income, the PRC government may levy tax on dividends paid by a PRC company to a Hong Kong resident (including natural person and legal entity), but such tax shall not exceed 10% of the total amount of dividends payable. If a Hong Kong resident directly holds 25% or more of equity in a PRC company and the Hong Kong resident is the beneficial owner of the dividends and meets other conditions, such tax shall not exceed 5% of the total amount of dividends payable by the PRC company. The Fifth Protocol provides that such provisions shall not apply to arrangements or transactions made for one of the primary purposes of obtaining such tax benefits.

In accordance with applicable regulations, we intend to withhold tax at the rate of 10% on dividends paid to non-PRC resident enterprise shareholders of H Shares, including the HKSCC Nominees. Non-PRC resident enterprises that are entitled to preferential tax rates for tax reduction or exemption under applicable income tax treaties are required to apply to the tax authorities in the PRC for a refund of the amount of the withholding tax in excess of the applicable treaty rate, and such refunds are subject to verification by the tax authorities of the PRC.

Taxation of Gains on Share Transfer

Individual Investors

According to the Individual Income Tax Law and its Implementation Regulations, individuals who dispose of equity interests in a PRC resident enterprise are subject to individual income tax levied on the gains from disposal at the tax rate of 20%. According to the Circular on Individual Income Tax Continuing to be Temporarily Exempted on Income of Individuals from the Transfer of Shares (《關於個人轉讓股票所得繼續暫免徵收個人所得稅的通知》) issued by the MOF and the STA on March 30, 1998, with effect from January 1, 1997, income of individuals derived from the transfer of shares in listed companies continues to be exempted from individual income tax. According to the Announcement on the List of Individual Income Tax Preferential Policies Continuing To Be Effective (《財政部、國家稅務總局關於繼續有效的個人所得稅優惠政策目錄的公告》) issued by the MOF and the STA on December 29, 2018, the Circular on Individual Income Tax Continuing to be Temporarily Exempted over Income of Individuals from the Transfer of Shares shall continue to be effective.

Enterprise Investors

According to the Enterprise Income Tax Law and its Implementation Regulations, if a non-PRC resident enterprise does not have an establishment or premise in the PRC or has an establishment or premise in the PRC but its PRC-sourced income has no real connection with such establishment or premise, it is generally subject to enterprise income tax at the rate of 10% on PRC-sourced income, including gains derived from the disposal of equity interests in a PRC resident enterprise. Such income tax payable by the non-resident enterprise shall be deducted and withheld at source, and the payer of the income shall have the obligation to withhold income tax from each payment or amount payable to the non-resident enterprise. Such withholding tax may be reduced or exempted in accordance with relevant tax treaties or agreements on avoidance of double taxation.

Shenzhen-Hong Kong Stock Connect Tax Policies

According to the Notice Regarding the Relevant Tax Policies for the Pilot Program of the Shenzhen-Hong Kong Stock Connect (《關於深港股票市場交易互聯互通機制試點有關稅收政策的通知》), which was issued on November 5, 2016 and became effective on December 5, 2016, for dividends and bonuses received by individual investors in Chinese Mainland from investing in H Shares listed on the Hong Kong Stock Exchange through the Shenzhen-Hong Kong Stock Connect, the H-share companies shall make an application to the CSDC so that the register of individual investors in Chinese Mainland will be provided by CSDC, and the H-share companies shall withhold individual income tax at the rate of 20% for those investors.

According to the Announcement on the Relevant Individual Income Tax Policies for Continuing the Implementation of Stock Connect Mechanisms in Shanghai-Hong Kong and Shenzhen-Hong Kong Stock Markets and the Mutual Recognition of Funds between Chinese Mainland and Hong Kong (《關於延續實施滬港、深港股票市場交易互聯互通機制和內地與香港基金互認有關個人所得稅政策的公告》) which was issued and became effective on August 21, 2023, the income of individual investors in Chinese Mainland derived from the price differences on transfer of shares listed on the Hong Kong Stock Exchange through the Shenzhen-Hong Kong Stock Connect will continue to be temporarily exempted from individual income tax.

According to the Notice Regarding the Relevant Tax Policies for the Pilot Program of the Shenzhen-Hong Kong Stock Connect, the income of enterprise investors in Chinese Mainland derived from the price differences on transfer of shares listed on the Hong Kong Stock Exchange through the Shenzhen-Hong Kong Stock Connect will be included in their total revenue and subject to enterprise income tax in accordance with the law. The income derived from dividends and bonuses received by enterprise investors in Chinese Mainland from investing in shares listed on the Hong Kong Stock Exchange through the Shenzhen-Hong Kong Stock Connect will be included in their total revenue and subject to enterprise income tax in accordance with the law. However, if a resident enterprise in Chinese Mainland receives dividends and bonuses after holding the H Shares continuously for at least 12 months, the relevant income tax shall be exempted in accordance with the law. Regarding the aforesaid income derived from dividends and bonuses received by enterprise investors in Chinese Mainland, the H-share companies will not withhold income tax on dividends and bonuses for Mainland enterprise investors, and the Mainland enterprise investors shall report and pay the income tax themselves.

Stamp Duty

According to the Stamp Duty Law of the PRC (《中華人民共和國印花稅法》), which was promulgated by the SCNPC on June 10, 2021 and became effective on July 1, 2022, PRC stamp duty only applies on specific proof executed or received within the PRC and legally binding force in the PRC and protected under the PRC laws, thus the requirements of the stamp duty imposed on the transfer of shares of PRC listed companies shall not apply to the acquisition and disposal of H Shares by non-PRC investors outside of the PRC.

PRINCIPAL TAXATION OF THE COMPANY IN THE PRC

Enterprise Income Tax

According to the Enterprise Income Tax Law and the Implementation Regulations, enterprises are classified into resident enterprises and non-resident enterprises. The PRC resident enterprises are required to pay enterprise income tax at the tax rate of 25%. Enterprises qualified as "High and New Technology Enterprises" are entitled to a reduced enterprise income tax rate of 15%.

Value-added Tax (VAT)

According to the Notice of the Ministry of Finance and the State Administration of Taxation on Adjusting Value-added Tax Rates (《財政部、國家稅務總局關於調整增值稅稅率的通知》) issued on April 4, 2018 and effective from May 1, 2018, the Announcement on Relevant Policies for Deepening the Value-added Tax Reform (《關於深化增值稅改革有關政策的公告》) issued by the MOF and other relevant authorities on March 20, 2019 and effective from April 1, 2019, and the Value-Added Tax Law of the PRC (《中華人民共和國增值稅法》) issued by the SCNPC on December 25, 2024 and effective from January 1, 2026, companies that are general taxpayers are subject to VAT rates of 13%, 9%, 6% and 0% respectively, depending on their businesses.

FOREIGN EXCHANGE ADMINISTRATION

The lawful currency of the PRC is Renminbi. The SAFE is responsible for the administration of all matters relating to foreign exchange, including the enforcement of foreign exchange regulations.

According to the Administrative Regulations on Foreign Exchange of the PRC (《中華人民共和國外匯管理條例》) last amended by the State Council on August 5, 2008 and effective on the same date, subject to compliance with certain procedural rules, payment for current account items with foreign exchange (such as trading items of goods, services and recurrent transfers) are not required to obtain prior approval from SAFE. On the contrary, conversion of Renminbi under capital account items into foreign currencies and remittance outward from the PRC, such as repayment of loans denominated in foreign currencies or remittance of foreign currencies into the PRC under capital account items, or offshore entities provide capital contribution or foreign currency loans to PRC entities, are required to obtain approval or registration by the competent administrative authority.

According to the Regulations for the Administration of Settlement, Sale and Payment of Foreign Exchange (《結匯、售匯及付匯管理規定》) promulgated by the People's Bank of China (中國人民銀行) (the "**PBOC**") on June 20, 1996 and became effective from July 1, 1996, the remaining restrictions on foreign exchange convertibility under current account items are removed, but the existing restrictions on foreign exchange transactions under capital account items are retained.

According to the relevant laws and regulations in the PRC, PRC enterprises (including foreign investment enterprises) which need foreign exchange for current account item transactions may, without the approval of the foreign exchange administrative authorities, effect payment through foreign exchange accounts opened at the designated foreign exchange bank, on the strength of valid transaction receipts and proof. Foreign investment enterprises which need foreign exchange for the distribution of profits to their shareholders and PRC enterprises which, in accordance with regulations, are required to pay fixed dividends to their shareholders in foreign exchange may, on the strength of resolutions of the board of directors on the distribution of profits, effect payment from their foreign exchange accounts or effect exchange and payment at the designated foreign exchange bank.

According to the Decisions of the State Council on the Matters of Canceling and Adjusting a Batch of Administrative Approval Items (《國務院關於取消和調整一批行政審批項目等事項的決定》) promulgated by the State Council on October 23, 2014 and became effective on the same date, the administrative approval requirement of the SAFE and its branches for the remittance and settlement of the proceeds raised from the overseas listing into RMB domestic accounts have been cancelled.

According to the Circular on Further Simplifying and Improving the Foreign Exchange Administration Policies for Direct Investment (《關於進一步簡化和改進直接投資外匯管理政策的通知》) promulgated by the SAFE in February 2015 and further amended in December 2019, eligible banks may, on behalf of the SAFE, directly handle the foreign exchange registration of overseas direct investment transactions, while the SAFE and its branches will, through the banks, exercise indirect supervision over the foreign exchange registration of direct investments.

According to the Notice of the State Administration of Foreign Exchange of the PRC on Revolutionizing and Regulating the Administrative Policies for Foreign Exchange Settlement of Capital Account Items (《國家外匯管理局關於改革和規範資本項目結匯管理政策的通知》) promulgated and implemented by the SAFE on June 9, 2016 and amended in December 2023, voluntary foreign exchange settlement of foreign exchange income from capital account items refers to the relevant policies where voluntary foreign exchange settlement has been clearly implemented on the foreign exchange income from capital account items (including the repatriation of foreign exchange capital funds, foreign debt principal amounts and proceeds of capital raised by overseas listing), the foreign exchange settlement of which may be handled at banks according to the actual needs of domestic institutions. The ratio of voluntary foreign exchange settlement of foreign exchange income from capital account items of domestic institutions is 100% for the time being, the above ratio may be adjusted by SAFE in a timely manner in light of the international receipts and payments conditions.

According to the Notice of the PBOC and the SAFE on Issues Concerning the Administration of Funds Raised by Domestic Enterprises Listed Overseas (《中國人民銀行 國家外匯管理局關於境內企業境外上市資金管理有關問題的通知》), which was promulgated by the PBOC and the SAFE on December 24, 2025 and became effective on April 1, 2026, a domestic enterprise shall, within 30 business days from the first trading day of its overseas listing or the completion of the over-allotment option, register the overseas listing with the local bank at the place of its establishment. In principle, funds raised by domestic enterprises through overseas listings shall be remitted back to the PRC in a timely manner. Where such funds are retained overseas for the conduct of overseas direct investment, overseas securities investment, overseas lending and other businesses, the domestic enterprise shall obtain the approval or filing documents from the business competent authorities before the date of completion of the overseas issuance or the over-allotment option, and shall comply with relevant cross-border funds administration provisions.